

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JOHN D. LOONEY,

Defendant.

22-CR-6009

GOVERNMENT'S NOTICE OF INTENT TO USE EVIDENCE

The United States of America, by and through its attorney, Trini E. Ross, United States Attorney for the Western District of New York, and Meghan K. McGuire, Assistant United States Attorney, of counsel, hereby files its Notice of Intent to Use Evidence pursuant to Fed.R.Crim.P. 12(b)(4). The government reserves the right to supplement this notice as additional evidence or information comes to the attention of the United States Attorney's Office.

The government presently intends to use all of the evidence provided to the defendant as discovery to date, including but not limited to the following:

1. Items seized by law enforcement from 117 Neuchatel Lane on March 1, 2019, including but no limited to the following electronic devices and the information extracted therefrom:
 - a. One (1) Hewlett Packard Pavilion dvG Laptop Computer; Model: dvGt-7000; S/N: 2CE31510XV;

- b. One (1) Hewlett Packard Pavilion dv7 Laptop Computer; Model: dv7t-6c00; S/N: 2CE2011X6Y;
 - c. One (1) Hewlett Packard Pavilion dvG Laptop Computer; Model: dv6t-6c00; S/N: 2CE2052K0H; and
 - d. Two (2) Thumb Drives, Color Turn, DT101 G2 16 GB.
- 2. Photographs taken at 117 Neuchatel Lane on March 1, 2019.
 - 3. Statements made by the defendant to FBI Special Agent Barry Couch and FBI Task F on May 1, 2019. These statements are summarized in the 302 prepared by TFO Carlton Turner, dated March 5, 2019. Portions of these statements were also recorded.
 - 4. Business records provided by Charter Communications.
 - 5. A certified copy of the Judgment of Conviction of the defendant for possession of child pornography.

The government will notify defense counsel of any additional evidence of the same kind that becomes available to it prior to trial.

Dated: February 4, 2022

TRINI E. ROSS
United States Attorney
By: s/Meghan K. McGuire
MEGHAN K. McGUIRE
Assistant United States Attorney
United States Attorney's Office

Western District of New York
100 State Street, Suite 500
Rochester, New York 14614
585/399-3922
Meghan.McGuire@usdoj.gov